

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

CASE NO. 19-md-02913-WHO

This Document Relates to:
All Class Actions

**NOTICE OF FILING OF OBJECTIONS
TO THE JLI CLASS ACTION
SETTLEMENT**

NOTICE OF FILING OF OBJECTIONS TO
THE JLI CLASS ACTION SETTLEMENT
CASE NO. 19-md-02913-WHO

1 In accordance with the Court's January 30, 2023, Order Granting the Motion for Preliminary
 2 Approval of the Class Action Settlement, Dkt. 3779, on July 21, 2023, Class Plaintiffs filed a notice
 3 identifying the individuals who sought to opt out of, and objected to, the JLI Settlement. Dkt. 4075.
 4 As the notice indicated, given the volume of objections received from a single third-party filer's
 5 clients (based on a template objection form the third-party filer provided to those clients), Epiq was
 6 continuing to process and compile the objections at the time of Class Plaintiffs' filing on July 21. *Id.*
 7 at n.1. Epiq continued to receive late objections regarding the third-party filer after that filing, but
 8 has now completed that process.

9 The Long-Form Notice directed any objecting class members to submit objections to both
 10 the Court and to Epiq by July 14, 2023. Five objections have been filed on the Court's docket. *See*
 11 Dkts. 4026, 4033, 4062, 4063, and 4077.¹ Epiq has received an additional 447 objections, 443 of
 12 which object to a single issue—Class Counsel's decision to reject claims submitted through third-
 13 party claims processor ClaimClam—and use the same template objection.² The 447 objections that
 14 do not appear on the Court's docket are attached to this notice as Exhibits 1-5, with all of the
 15 ClaimClam-related objections contained in Exhibit 5. Attached as Exhibit 6 is an updated list of the
 16 443 ClaimClam-related objections, which includes those objections received after Class Plaintiffs'
 17 filing on July 21, listed in the order in which they appear in Exhibit 5.

18 A chart identifying the previously-filed objections, and the objections attached to this notice,
 19 is below.

24 ¹ In addition, three of the objections regarding the third-party filer issue were both emailed to Epiq
 25 and filed by the Clerk. *See* Dkt. 4078 (Melinda Woiten, docketed as "Melinda Wolten"), Dkt. 4083
 26 (Allyson Duranceau), and Dkt. 4084 (Hunter Wentworth). For simplicity, these three objections are
 included in the tally of the additional objections, and the emailed objections are included in Exhibit
 5.

27 ² More than 120 of the ClaimClam objections were not timely received by Epiq. Given that the
 28 objections are form objections raising the same issue, Class Counsel has nonetheless included them
 in Exhibit 5 below and reserves all rights with respect to the timeliness of such objections.

Objector(s)	Location of Objection in the Record	General Description of Objection
John Gugliotta	Dkt. 4026	Various objections to the notice and the absence of non-monetary relief
Samuel Marcom	Dkt. 4033	Disagrees with the basis of the lawsuit and JUUL being singled out among e-cigarettes
Cade Beuparlant, Matthew Murhphy, and Marianne Savage	Dkt. 4062	Request that \$30 million of the JLI Settlement be distributed as <i>cy pres</i> to a non-profit organization
Reilly Stephens	Dkt. 4063	Objects to Class Counsel's fee request.
Melissa Stawicki	Dkt. 4077	No basis provided
Olin Ashak	Ex. 1	Disagrees with the basis of the lawsuit and the process for objecting
Lawanda Ready	Ex. 2	No basis provided
John Stampfer	Ex. 3	No basis provided
Austin Toole	Ex. 4	No basis provided
Third-party filer ClaimClam and numerous ClaimClam clients	Ex. 5	Objection to Class Counsel's decision to disallow claims to be filed through third-party filer ClaimClam
Updated List of ClaimClam Objectors	Ex. 6	

Dated: July 28, 2023

Respectfully submitted,

By: /s/ Dena C. Sharp

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Co-Lead Counsel and Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023, because the CM/ECF system was inoperable at the time of filing, I sent the foregoing document via email to the Court. As soon as the CM/ECF system becomes operable again, I will cause the foregoing document to be electronically filed with the Clerk of the Court using, which will automatically send notification of the filing to all counsel of record.

By: /s/ Dena C. Sharp
Dena C. Sharp